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 ELECTRONICALLY FILED  
 DOC #: \_\_\_\_\_  
 DATE FILED: 7/28/2020

Hartford, CT 06104-2903

July 27, 2020

BY EMAIL [Torres\\_NYSDChambers@nysd.uscourts.gov](mailto:Torres_NYSDChambers@nysd.uscourts.gov)

Honorable District Judge Analisa Torres  
 Southern District of New York  
 500 Pearl Street  
 New York, NY 10007

**Re: Jonas v. Noble Construction Group, LLC, et al.**  
**Matter No. 2019124537**  
**Claim No. FKR0752**  
**Case No. 1: 19-cv-05574-AT**  
**Venue: USDC/SDNY**

Dear Honorable District Judge Analisa Torres:

Please be advised this office represents Erika Szente Custom Window Treatment, LLC, d/b/a Beacon Interiors i/s/h/a Windows Fashions, LLC d/b/a Beacon Interiors who is a Defendant/Third-Party Defendant in this action. It is respectfully requested that the dates in the Court's Order dated April 23, 2020 be extended because of outstanding discovery such as depositions and IME's and responses to interrogatories and demands due to the COVID virus. The first round of depositions have been conducted remotely in July. There are at least three non-party depositions that must be conducted and we are trying to set same up. One is set up for July 30, 2020.

1. It is requested that the deposition completion date be extended from the original date of July 29, 2020 to the new proposed date of September 15, 2020.
2. It is requested that all fact discovery completion be extended from the original date of July 29, 2020 to the new proposed date of September 15, 2020.
3. It is requested that all expert discovery shall be completed from the original date of November 10, 2020 to the new proposed date of December 11, 2020 as authorizations have to be processed for plaintiff's wrist injury and setting up the IME's.
4. It is respectfully requested the next case management conference be rescheduled from the original date in the said Order of August 20, 2020 to new proposed date of September 22, 2020.

This is the fourth request for an adjournment, and said request is being made due to the above reason. There have been three previous requests for said extension and the last one was granted on April 23, 2020. Our adversaries have been notified and all consent to this request except for Timothy Lavin, Esq, from plaintiff's office who objects to any extension of expert discovery and only to July 30, 2020 for fact discovery.

We respectfully thank the Court and all counsel for their consideration in this matter.

Very truly yours,

*Frederick D Schmidt Jr*

Frederick D Schmidt Jr

cc: Ronai & Ronai, LLP  
Fabiani, Cohen, Hall, LLP  
Perry Van Etten Rozanski  
(all by ECF)

GRANTED. It is ORDERED that:

1. The deadline to complete depositions is EXTENDED to **September 15, 2020**.
2. The fact discovery deadline is EXTENDED to **September 15, 2020**.
3. The expert discovery deadline is EXTENDED to **December 11, 2020**.
4. The Case management conference scheduled for August 20, 2020 is ADJOURNED to **October 5, 2020**, at **11:00 a.m.** By **September 28, 2020**, the parties shall submit their joint status letter.

SO ORDERED.

Dated: July 28, 2020  
New York, New York

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*AT*  
ANALISA TORRES  
United States District Judge